

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	
	:	Criminal No. 1:01-CR-00107
v.	:	
	:	Judge William W. Caldwell
BRUCE WARD	:	
	:	(Electronically Filed)

MOTION TO EXTEND VOLUNTARY SURRENDER DATE

AND NOW comes the defendant, Bruce Ward, through his attorney Thomas A. Thornton of the Federal Public Defender's Office, and files this Motion to Extend Voluntary Surrender Date, and in support thereof the following is averred:

1. On December 17, 2004, Bruce Ward appeared for a supervised release revocation hearing before this Honorable Court.
2. On December 17, 2004, Mr. Ward's supervised release was revoked.
3. Mr. Ward was sentenced to 9 months imprisonment and ordered to voluntarily surrender himself for service of his sentence on Monday, January 10, 2005.
4. On January 7, 2005, defense counsel was advised that the Bureau of Prisons had not yet designated Mr. Ward to a facility to serve his sentence.

5. Because Mr. Ward has not yet been designated, it is respectfully requested that his voluntary surrender date be extended for two week to Monday, January 24, 2005.

6. Assistant United States Attorney James T. Clancy concurs in this Motion to Extend Voluntary Surrender Date.

WHEREFORE, it is respectfully requested that the within Motion to Extend Voluntary Surrender Date

Respectfully submitted,

Date: January 7, 2005

/s/ Thomas A. Thornton
THOMAS A. THORNTON, ESQUIRE
Asst. Federal Public Defender
Attorney ID #PA44208
100 Chestnut Street, Suite 306
Harrisburg, PA 17101
Tel. No.: (717) 782-2237
Fax No.: (717) 782-3881
(thomas_thornton@fd.org)
Attorney for Bruce Ward

CERTIFICATE OF SERVICE

I, Thomas A. Thornton of the Federal Public Defender's Office, do hereby certify that on this date I served a copy of the **MOTION TO CONTINUE SUPERVISED RELEASE VIOLATION HEARING**, via Electronic Case Filing, or by placing the same in the United States mail, first class in Harrisburg, Pennsylvania, addressed to the following:

James Clancy, Esquire
United States Attorney's Office
Federal Building, Room 217
228 Walnut Street
Harrisburg, PA 17108
(james.clancy@usdoj.org)

Bruce Ward
1110 Rana Villa Avenue
Camp Hill, PA 17011

Date: January 7, 2005

/s/ Thomas A. Thornton
THOMAS A. THORNTON, ESQUIRE
Asst. Federal Public Defender
Attorney ID #PA44208
100 Chestnut Street, Suite 306
Harrisburg, PA 17101
Tel. No.: (717) 782-2237
Fax No.: (717) 782-3881
(thomas_thornton@fd.org)
Attorney for Bruce Ward